

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SOLAS OLED LTD.,

*Plaintiff,*

Case No. 6:19-cv-00236-ADA

v.

LG DISPLAY CO., LTD.,  
LG ELECTRONICS, INC., and  
SONY CORPORATION,

*Defendants.*

**JOINT CLAIM CONSTRUCTION STATEMENT**

Under the Court’s December 21, 2019 Scheduling Order (Dkt. 59) and April 11, 2020 Order, Plaintiff Solas OLED Ltd. (“Solas”) and Defendants LG Display Co., LTD, LG Electronics, Inc., and Sony Corporation (“Defendants”) submit this Joint Claim Construction Statement. This case involves three asserted patents: U.S. Patent Nos. 7,907,137 (“’137 patent,” Dkt. 32-3) 7,432,891 (“’891 patent,” Dkt. 32-1), and 7,573,068 (“’068 patent,” Dkt. 32-2). Solas asserts claims 1 and 3 of the ’891 patent, claims 10, 11, 15, 36, 37, and 39 of the ’137 patent, and claims 1, 5, 10, 12, 13, and 17 of the ’068 patent.

## **I. AGREED CLAIM CONSTRUCTIONS**

### **A. ’137 Patent**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Agreed Construction</b>
“luminance gradation”	10, 36	light emitting level

### **B. ’068 Patent**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Agreed Construction</b>
“supply lines”	1, 13	conductive lines supplying current or voltage

## **II. DISPUTED TERMS FOR CONSTRUCTION**

### **A. ’137 Patent**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Solas’s Construction</b>	<b>Defendants’ Construction</b>
“a gradation current having a current value”	10, 36	a current having a current value and conveying information about a level	an actual current (not voltage) with a value corresponding to a luminance level

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Solas's Construction</b>	<b>Defendants' Construction</b>
"gradation signal"	10, 15, 36, 37, 39	signal conveying information about a level	a gradation current with a current value sent to a pixel to set a luminance gradation
<p>"generates, as the gradation signal, a non-light emitting display voltage having a predetermined voltage value"</p> <p>"a non-light emitting display voltage having a predetermined voltage value for allowing the optical element to perform a non-light emitting operation is generated as the gradation signal"</p>	15, 39	Not indefinite	Indefinite
"... through a data line ... through the data line ... through the data line"	10, 36	plain and ordinary meaning. "a data line" means "one or more data lines." The antecedent basis for "the data line" is "a data line."	the gradation current is supplied, the threshold voltage is detected, and the compensation voltage is applied through the same data line
"before"	10	plain and ordinary meaning	earlier in time (not at the same time)
"after"	36	plain and ordinary meaning	later in time (not at the same time)

**B. '891 Patent**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Solas's Construction</b>	<b>Defendants' Construction</b>
"a third thin film transistor which during driving its gate through a driving conductor taps a diode driving current at an output of said first current-driving transistor and supplies a current measuring-[measuring] and voltage regulating circuit, said current measuring- and voltage regulating circuit providing to the data conductor a voltage signal which is dependent on a current measuring result and a voltage comparison"	1, 3	Plain and ordinary meaning. The claimed "providing" by the current measuring- and voltage regulating circuit ("said current measuring- and voltage regulating circuit providing to the data conductor a voltage signal which is dependent on a current measuring result and a voltage comparison") is not required to occur during driving of the third thin film transistor's gate.	The claimed "providing" by the current measuring- and voltage regulating circuit ("said current measuring- and voltage regulating circuit providing to the data conductor a voltage signal which is dependent on a current measuring result and a voltage comparison") is required to occur during driving of the third thin film transistor's gate.
"current measuring"	1, 3	plain and ordinary meaning	measuring actual current (not voltage)
"wherein all above mentioned elements of the driving circuit are located at a same side of said light emitting diode"	3	wherein all above mentioned elements of the driving circuit are electrically connected to and physically located on the same side of the layers of said light emitting diode	wherein all above mentioned elements of the driving circuit are electrically connected to the anode or cathode of said light emitting diode

**C. '068 Patent**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Solas's Construction</b>	<b>Defendants' Construction</b>
"formed on said plurality of supply lines along said plurality of supply lines"	1	formed on said plurality of supply lines over the length or direction of said plurality of supply lines	formed on said plurality of supply lines over the length of said plurality of supply lines
"connected to said plurality of supply lines along said plurality of supply lines"	13	connected to said plurality of supply lines over the length or direction of said plurality of supply lines	connected to said plurality of supply lines over the length of said plurality of supply lines
"patterned"	1, 13	formed in one or more layers	formed in a single layer
"patterned together"	1, 13	patterned to fit together	patterned at the same time
"signal lines"	1, 13	conductive lines supplying signals	conductive lines supplying a value corresponding to a luminance level
"feed interconnections"	1, 10, 12, 13, 17	conductive structures in a layer or layers that provide connections to a source that supplies voltage and/or current	conductive structures, in a layer or layers different from the gates, sources and drains, that provide connections to a source that supplies voltage and/or current

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on May 1, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3)(A).

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